



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

November 14, 2001

via electronic filing

Magalie R. Salas, Secretary
Office of the Secretary
Federal Communications Commission
Portals II
445 Twelfth Street, S.W.
Suite TW-A325
Washington, D.C. 20554

**Re: Reply Comments of the Pennsylvania Public Utility Commission
In the Matter of Numbering Resource Optimization
CC Docket No. 99-200; DA 01-2419**

Dear Ms. Salas:

Attached for filing in the above matter please find one copy of the Pennsylvania Public Utility Commission's Reply Comments, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200; DA 01-2419.

Sincerely,

Deanne M. O'Dell
Assistant Counsel

Enclosure

cc: per certificate of service

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

WASHINGTON, D.C. 20554

In the Matter of)	
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Numbering Resource Optimization)	CC Docket No. 99-200
)	
)	DA 01-2419

**REPLY COMMENTS OF THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

The Pennsylvania Public Utility Commission (PAPUC) submits the following reply comments in further support of its comments filed November 6, 2001 in response to the Commission's Public Notice released October 17, 2001 wherein the Common Carrier Bureau is seeking comment on the National Thousands-Block Number Pooling Rollout Schedule. Several commenters¹ advocate that the Commission should revise its tentative rollout schedule to ensure that pooling is implemented in a maximum of three NPAs per Number Portability Administration Center ("NPAC")² region per quarter. While the PAPUC is mindful of the work involved for carriers to establish pooling,³ the PAPUC submits that the Commission should grant its request to implement pooling in the 215/267/445 NPAs during the first quarter of national rollout rather than during the second quarter for the following reasons.

¹ Comments of BellSouth Corporation at 1-5; Comments of SBC Communications, Inc. at 2-3; Comments of Verizon at 1-2; Comments of The United States Telecom Association at 2-4; Comments of the California Public Utilities as the People of the State of California at 2-3.

² The NPAC was developed to support the implementation of LNP and it provides supporting turn-key operational services, coordinates the porting of telephone numbers between carriers, and downloads routing information to update local routing databases. More information about the NPACs can be found at <http://www.npac.com/>.

³ To date, three mandatory pools have been implemented in Pennsylvania, and two accelerated voluntary pools will be implemented in February and March of 2002. Commission staff has been actively involved in working with the industry to ensure the successful implementation of pooling in Pennsylvania.

First, adding the 215/267/445 NPAs to the first quarter rollout of pooling translates to the implementation of pooling in five Mid-Atlantic NPAs.⁴ This is both feasible and consistent with the past practice of the Mid-Atlantic region to implement pooling in an average of five NPAs per quarter. In the third quarter of 2001, for example, pooling was implemented in six Mid-Atlantic region NPAs (New Jersey's 210/551 NPAs and Maryland's 240/301, 443/410 NPAs). The most aggressive rollout of pooling in the Mid-Atlantic region, however, is occurring now during the fourth quarter of 2001, when pooling is in the process of being implemented in seven NPAs (Pennsylvania's 412, 724 NPAs, Virginia's 757, 540, 276 NPAs, and New Jersey's 862, 848 NPAs.) Finally, pooling was implemented in four NPAs in the Mid-Atlantic region during the second quarter of 2001 (Pennsylvania's 610/484 NPAs and Virginia's 804/434 NPAs); likewise, pooling will be implemented in four NPAs in the Mid-Atlantic region during the first quarter of 2002 (Pennsylvania's 717, 570 NPAs and New Jersey's 973, 732 NPAs).⁵ Since our experience in the Mid-Atlantic region demonstrates that an average of five Mid-Atlantic NPAs can be successfully pooled during the same quarter, we urge the Commission to add the 215/267/445 NPAs to its schedule for the first quarter of national rollout.

Second, the PAPUC considered and rejected the same arguments currently being raised by these commenters when deciding to implement its second and third mandatory pools in the 412 and 724 NPAs on October 29, 2001. Because the affected industry members accepted our decision and complied with our order, pooling has been or will be implemented in seven Mid-

⁴ Pooling is currently scheduled to be implemented in the District of Columbia's 202 NPA, Virginia's 571/703 NPAs and Delaware's 302 NPA during the first quarter. Adding the 215/267/445 NPAs to this quarter would only add two more NPAs since no NXX codes from the 445 NPA have been assigned to carriers. See Comments of the PAPUC at 5-10.

⁵ See NeuStar's "Pooling Timeline" available at <http://www.numberpool.com>. Also at this website are reports by NPA regarding the status of the pools. As the Commission can verify by looking at the pooling reports for Pennsylvania's 610/484, 412, and 724 pools, all of these pools have been extremely successful.

Atlantic NPAs by December 1, 2001 with pooling already occurring in four of these NPAs. As our experience demonstrates, pooling can and has been successfully implemented in more than three NPAs in the Mid-Atlantic region per quarter. Therefore, the Commission should grant the PAPUC's request to have its 215/267/445 NPAs pooled during the first quarter of national rollout rather than during the second quarter.

Third, because telecommunications carriers do recognize the value of thousands-block number pooling, they can agree to move forward with pooling in more than three NPAs in the Mid-Atlantic region during the first quarter of national rollout. In Pennsylvania, the telecommunications carriers with NXX codes in our 717 and 570 NPAs willingly agreed to implement accelerated voluntary pooling in these NPAs during the first quarter of 2002 even though the addition of these NPAs means that pooling will be implemented in four Mid-Atlantic NPAs during that quarter.

Finally, even if the Commission is hesitant to implement pooling in five Mid-Atlantic region NPAs during the first quarter of national rollout, the PAPUC notes that only two NPAs in the Northeast NPAC region are scheduled for pooling during this quarter. Because there is an open "slot" in the Northeast NPAC region which is adjacent to the Mid-Atlantic Region, we submit that moving Pennsylvania's 215/267/445 NPAs into the first quarter of national rollout is feasible.

In conclusion, the PAPUC asks the Commission to recognize the urgent need for pooling in Pennsylvania's 215/267/445 NPAs during the first quarter of national rollout. Further, we urge the Commission to not be deterred from granting our request based on its "tentative" conclusion in March of 2000 that national pooling should be rolled out in three NPAs per NPAC quarter per

region.⁶ The experience of the PAPUC has shown that five NPAs can be successfully pooled in the Mid-Atlantic region during the first quarter of national rollout. Therefore, we urge the Commission to grant our request to direct that national thousands-block number pooling shall be implemented in the 215/267/445 NPAs during the first quarter of national rollout.

Respectfully submitted,

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

By its counsel:

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Bohdan R. Pankiw
Chief Counsel

Dated: November 14, 2001

⁶ “. . .we also tentatively conclude that the rollout should encompass a maximum of three NPAs in each NPAC region per quarter.” *Report and Order and Further Notice of Proposed Rulemaking in the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, 15 FCC Rcd 7574 at ¶ 159 (2000).

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WASHINGTON, D.C. 20554**

In the Matter of)

Numbering Resource Optimization)

CC Docket No. 99-200

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CERTIFICATE OF SERVICE

I, Deanne M.O'Dell, hereby certify that I have on this 14th day of November 2001, filed a copy of the Pennsylvania Public Utility Commission's Comments upon the Secretary of the Federal Communications Commission by electronic filing and that I have served a true and correct copy of the Comments upon the other persons listed below by first class mail.

Via First Class Mail:

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